

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

RECEIVED

In the Matter of)

Billed Party Preference for)
InterLATA 0+ Calls)

CC Docket No. 92-77

FEB 22 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

T-NETIX, INC. PETITION FOR CLARIFICATION AND WAIVER

T-NETIX, Inc. ("T-NETIX"), by its attorneys and pursuant to Commission Rules 1.3 and 1.429, 47 C.F.R. §§ 1.3, 1.429, hereby seeks clarification and a temporary waiver of the amended rate disclosure rules promulgated in the Commission's *Second Reconsideration Order* in this proceeding.²

T-NETIX requests clarification of the new "total cost of the call" language in Amended Rule 64.710 in order to make clear that per-minute rate quotations for a call's duration-based charges are still permissible, but does *not* seek any modification to the substance of the rate disclosure obligations imposed on inmate operator service providers ("OSPs"). In addition, T-NETIX requests a time-limited waiver of the *Second Reconsideration Order*'s rejection of "maximum" rate quotations under Amended Rule 64.710 because a relatively small proportion of its inmate services equipment is technically incapable of supplying per-minute rate quotations other than for maximum rates. This older premises equipment will be replaced by T-NETIX on a highly accelerated deployment schedule, as described in the attached affidavit of Richard E. Cree, T-NETIX's Executive Vice President, if a temporary, 18-month waiver of the *Second Reconsideration Order* is granted by the Commission.

² *Billed Party Preference for InterLATA 0+ Calls*, CC Docket No. 92-77, Second Order on Reconsideration, FCC 01-355 (rel. Dec. 12, 2001) ("*Second Reconsideration Order*"); 47 C.F.R. § 64.710.

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BACKGROUND

T-NETIX is a provider of inmate telecommunications services and equipment serving correctional facilities throughout the United States. T-NETIX's services comprise payphone service, operator service, and local and long-distance voice communications services. It has served inmates and correctional facilities since 1989.

The Commission's billed party preference rules implement Congress's mandate for the fair practices of operator service providers ("OSPs") enacted in the Telephone Operator Consumer Improvements Act of 1990 ("TOCSIA").³ TOCSIA requires, among other things, that OSPs identify themselves to payphone callers, disclose in some fashion the rates applied to the call, and permit the caller to terminate the call prior to completion and billing. 47 U.S.C. § 226(b)(1).

The Commission first implemented TOCSIA in *Policies and Rules Concerning Operator Services Providers*, CC Docket No. 90-313, Report and Order, 6 FCC Rcd. 2744 (1991). In that order, the Commission adopted rules requiring all OSPs to provide, prior to connecting an inter-exchange payphone call, real-time quotes stating the total cost of the call. 6 FCC Rcd. at 2757; 47 C.F.R. § 64.703. The Commission later modified this rule as to inmate OSPs, creating a separate rule governing their pre-connect disclosures. *Billed Party Preference for InterLATA 0+ Calls*, CC Docket No. 92-77, Second Report and Order, 13 FCC Rcd. 6122 (1998); 47 C.F.R. § 64.710. The Commission found that due to the highly specialized nature of inmate telephone systems, inmate OSPs must only disclose to the calling party how he or she can obtain rate in-

³ Pub. L. No. 101-435, 104 Stat. 986 (1990) (codified at 47 U.S.C. § 226).

formation without having to make a separate call. 13 FCC Rcd. at 6157; 47 C.F.R.

§ 64.710(a)(1).⁴

US West filed a petition for clarification or, in the alternative, waiver, of this Rule on April 9, 1998.⁵ In its petition, US West presented the Commission with two questions for clarification: (1) whether inmate OSPs may simply disclose the maximum call rate that could be applied to the call; and (2) whether it may be permissible to require the calling party to dial a separate number in order to obtain rate information. US West Petition at 18-19.

The *Second Reconsideration Order*, released December 12, 2001, answered each question in the negative. First, the Commission held that a system that quoted only maximum rates “would not provide accurate rate quotes, and excessive quotations might unnecessarily discourage calling.” *Second Reconsideration Order* ¶ 15. The Commission further reasoned that permitting maximum rate quotes “would be inconsistent with our statutory obligations to ‘ensure that consumers have the opportunity to make informed choices’ in using operator services[.]” *Id.* (citation omitted). Secondly, the Commission held that requiring inmate callers to dial a separate number to obtain rate information “could compromise the special security measures the Commission has acknowledged that inmate calls require.” *Id.*

The *Second Reconsideration Order* also amended Rule 64.710 in two: (1) it applies only to interstate, but not interexchange, calls; and (2) it requires inmate OSPs to disclose “the total cost of the call” rather than the rate “for the first minute of the call and for additional minutes.” The Commission explained that it was “revising the text of the rule applicable to

⁴ “Each provider of inmate operator services shall: ... before connecting any interstate, domestic, interexchange telephone call ... disclose immediately thereafter how the consumer may obtain rate quotations, by dialing no more than two digits or remaining on the line, for the first minute of the call and for additional minutes[.]” 47 C.F.R. § 64.710 (a)(1).

⁵ Petition for Clarification or Waiver or, in the Alternative, for Clarification and Reconsideration of US West, Inc., CC Docket No. 92-77 (Apr. 9, 1998) (“US West Petition”).

providers of inmate operator services to more closely parallel the language of the comparable requirements for OSPs” and that “this editorial change does not affect the substance of the rule.”

Second Reconsideration Order ¶ 24.

I. THE COMMISSION SHOULD CLARIFY AMENDED RULE 64.710 AS TO “TOTAL COST OF THE CALL”

Although the Commission’s revisions to Rule 64.710 were not intended to “affect [its] substance,” the new language of the provision is ambiguous. While the former rule provided that inmate OSPs must disclose “how the consumer may obtain rate quotations . . . for the first minute of the call and for additional minutes,” the rule now requires inmate OSPs to inform the consumer “how to obtain the total cost of the call.” T-NETIX seeks clarification of this language, as read literally it may require disclosure of information – specifically, the “variable (duration-based) charges for the call” – that no inmate OSP is capable of providing until a collect call is both completed by the carrier and terminated by the end user.

Because Rule 64.710 requires OSPs to be prepared to disclose rate information *prior* to connecting any interstate call, the requirement to disclose the “total cost” of the call could make compliance impossible. The total cost of a collect call requires the OSP to know the length of the call, something that cannot be calculated until after the called party has hung up. Unfortunately, the language used by the Commission, which defines “total cost” as “both the variable (duration-based) charges for the call and the total per call charges, exclusive of taxes, that the carrier, or its billing agent, may collect from the consumer for the call,” suggests that inmate OSPs must in fact calculate both per-minute rates and call duration in order to disclose the “total cost” to the consumer.

This result does not appear to be what the Commission intended. However, the definition of “total cost” only amplifies the ambiguity of the new requirement. Rule 64.710 formerly

required the disclosure of “rate quotations . . . for the first minute of the call and for additional minutes.” By eliminating this language in favor of the new reference to “duration-based charges,” the amended provision may be construed to mean something other than disclosure of per-minute rates in order to meet the requirement of quoting duration-based costs. The definition also uses the term “total cost,” by referring to “total per call charges, exclusive of taxes,” which again suggests that a quotation of per-minute rates is inadequate. Indeed, because the language of the rule does not plainly state what inmate OSPs are required to disclose, there may be legal impediments to its enforcement. *See Connally v. General Constr. Co.*, 269 U.S. 385, 391 (1926) (“[A] statute which either forbids or requires the doing of an act in terms so vague that mean of common intelligence must necessarily guess at its meaning and differ as to its application violates the first essential of due process of law.”).

T-NETIX does not believe this is the result contemplated by the Commission. To the contrary, the *Second Reconsideration Order* appears to be designed to ensure that all surcharges and premise-based fees, in addition to per-minute rates, must be disclosed to recipients of collect calls placed via inmate OSPs. (In contrast, ordinary OSPs are not required to disclose premise surcharges, because they are subject to a separate disclosure obligation, via “tent card” or otherwise, imposed on the payphone aggregator. *See Second Reconsideration Order* ¶ 12.) The Order states that inmate OSPs must disclose the total cost of the call, “including any surcharge or premises-imposed fee.” *Second Reconsideration Order* ¶ 24.

The Commission is of course aware that before a call is terminated, “variable (duration based) charges” can only be quoted on a per-minute or other variable basis. T-NETIX therefore suggests that the Commission clarify the definition of “total cost of the call” in Rule 64.710 to read as follows:

The phrase “total cost of the call,” as used in this subsection, means both the *actual rate for the first minute and each additional minute that shall be applied to the call* and the total *non-variable* per call charges, exclusive of taxes, that the carrier, or its billing agent, may collect from the consumer for the call. Such phrase shall include any per call surcharge imposed by the correctional institution, unless it is subject to regulation itself as a common carrier for imposing such surcharges, if the contract between the carrier and the correctional institution prohibits both resale and the use of pre-paid calling card arrangements.

By modifying Rule 64.710 in this manner, the Commission would avoid an interpretation that could force inmate OSPs to guess at the length of the end user’s call, while still requiring the disclosure of all surcharges and premise-based fees and fully meeting the Commission’s “editorial” objective of tracking the language of the general OSP rate disclosure requirement. By using the phrase “actual rate,” this proposed language would also codify the interpretation in the *Second Reconsideration Order* that “generic,” maximum rate quotations are impermissible for inmate OSPs.

II. GRANTING T-NETIX A TEMPORARY WAIVER OF AMENDED RULE 64.710 IS WARRANTED AND IN THE PUBLIC INTEREST

T-NETIX seeks time-limited, temporary relief from the Commission’s amended rate disclosure rule because for a relatively small proportion of its facilities, compliance is presently technically infeasible. T-NETIX has embarked on a multi-year network upgrade project that will, when completed, enable its full compliance with Amended Rule 64.710. If a temporary waiver is granted, T-NETIX would double its efforts in completing this buildout, reducing time for compliance by half. Should the Commission deny this relief, it will only further burden T-NETIX in its efforts to complete its current buildout. Its request is made for good cause, and grant of this limited relief is warranted under the special technological and logistical circumstances facing T-NETIX today. Thus, for the reasons explained further below, T-NETIX’s request for waiver is in the public interest and should be granted.

A. Standard for Grant of Waiver

Commission Rule 1.3 provides that parties may obtain a waiver of any rule “for good cause shown.” 47 C.F.R. § 1.3. The D.C. Circuit has held that applicants for waiver must show that “special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.” *WAIT Radio v. FCC*, 418 F.2d 1153, 159 (D.C. Cir. 1969).

Under this standard, the Commission has granted waivers of several rules, both to individual companies and entire industry segments, where technical feasibility considerations prevented immediate compliance with its rules. For example, the Commission has granted waivers of the local number portability (“LNP”) rules for both wireless⁶ and wireline⁷ carriers, as well as its payphone coding digits requirements,⁸ and wireless E911 rules.⁹ In the wireline LNP docket, the Commission in 1998 granted an industry-wide waiver of its March 31, 1998 Phase I deadline in accordance with the recommendation of the Chairman of the North American Numbering Council (“NANC”).¹⁰ Because the NANC had informed the Commission of “vendor failure to provide a stable platform to support local number portability,”¹¹ the Commission extended the deadline for filing individual requests for waiver of its LNP implementation schedule that had been adopted in March 1997.¹² Several individual LNP waivers were subsequently granted, lasting from 30 days to 3 months.¹³

⁶ 47 C.F.R. § 52.31.

⁷ 47 C.F.R. § 52.3.

⁸ *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, Order on Reconsideration, FCC 96-388, 11 FCC Rcd. 21, 265 ¶ 98 (1996).

⁹ 47 C.F.R. § 20.18

¹⁰ *Local Number Portability Phase I Implementation*, CC Docket No. 95-116, Order, DA 98-152 (rel. Jan. 28 1998).

¹¹ *Id.* ¶ 1.

¹² *Id.* ¶ 5.

¹³ *Telephone Number Portability, Petition for Extension of the Deployment Schedule for Long-Term Database Methods for Local Number Portability: Phases I, III and IV, NextLink Telephone Companies*, NSD File L-98-89, DA 98-1433 (rel. July 17, 1998) (granting NextLink waivers of the June 30, 1998 Phase III deadline for up to five months); *Telephone Number Portability, Cincinnati Bell Telephone Company's Provision of Local Number*

The Commission also granted several waivers of its rules requiring payphone service providers (“PSPs”) to transmit real-time coding digits with all 1-800 and 0+ access code calls in order that the underlying carrier can identify the PSP for compensation. Commission orders require local exchange carriers (“LECs”) to assign payphone-specific coding digits to PSPs, whose payphones must then include the technology to pass those coding digits along. Several LECs and PSPs petitioned the Commission for extension of the October 7, 1997 implementation deadline on the grounds that “‘outstanding issues involving per-call tracking and payphone coding . . . cannot be resolved[.]’”¹⁴ Accordingly, the Commission granted an industry-wide waiver for five months, noting that the industry was working to implement the requisite technology “collaboratively in good faith.”¹⁵ Further waivers of the extended deadline were subsequently issued for as long as nine months.¹⁶

In the case of wireless E911 rules, which require wireless carriers to deploy handsets that include call tracking technology to locate 911 cell phone calls, the Commission granted waivers of two to four years to Sprint, Cingular, Verizon Wireless, AT&T Wireless and Nextel — companies comprising over 75% of the wireless market — due to delays in developing and producing E911-compliant handsets.¹⁷ The Commission reasoned that such waivers were in the public

Portability in the Cincinnati Metropolitan Statistical Area, NSD File L-98-14, DA 98-1265 (rel. June 26, 1998) (granting several waivers of the Phase II and Phase III deadlines to various LECs for periods of one to four months).

¹⁴ *Implementation of the Pay Telephone Reclassifications and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, Order, DA 97-2162 ¶ 5 (rel. Oct. 7, 1997) (quoting Petition for Waiver of the United States Telephone Association (Sept. 30, 1997)).

¹⁵ *Id.* ¶ 10.

¹⁶ *Implementation of the Pay Telephone Reclassifications and Compensation Provisions of the Telecommunications Act of 1996*, Southern New England Telephone SNET Request to Extend Limited Waiver of Coding Digit Requirement, CC Docket No. 96-128, Memorandum Opinion and Order, DA 98-1973 (rel. Oct. 1, 1998) (granting a 30-day extension); *Implementation of the Pay Telephone Reclassifications and Compensation Provisions of the Telecommunications Act of 1996, SBC Request to Extend Limited Waiver of Coding Digit Requirement*, CC Docket No. 96-128, Memorandum Opinion and Order, DA 98-1101 (rel. June 10, 1998) (granting a nine-month extension).

¹⁷ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Request for Waiver by Sprint Spectrum, L.P. d/b/a Sprint PCS*, CC Docket No. 94-102, Order, FCC 01-297 (rel. Oct. 12, 2001); *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency*

interest due to “the special circumstances . . . in deploying location capability, the lack of viable alternatives demonstrated by [the] trial of location technologies, and the overall benefits to public safety.”¹⁸

Particularly instructive in these waiver orders, for purposes of the instant petition, is the Commission’s emphasis on the petitioners’ alternative proposals for wireless E911 compliance. In every case, the Commission found that these proposals exhibited the same qualities: (1) a “plan that is specific, focused, and limited in scope;” (2) that the petitioner was “as close as possible to full compliance;” and (3) that the proposal demonstrated a “clear path to total compliance.”¹⁹ Because the petitioners had provided the Commission with such comprehensive proposals that ensured full compliance as expeditiously as possible, they received their waivers. T-NETIX fully meets this standard, as demonstrated in the following section.

B. The Commission Should Waive Amended Rule 64.710 for a Limited Time in Order to Allow T-NETIX to Complete Its Ongoing Network Upgrade

T-NETIX requests that the Commission waive the prohibition on maximum rate quotes by inmate OSPs for a subset of T-NETIX’s correctional institution facilities a period of 18 months marked from January 22, 2002, the date on which the *Second Reconsideration Order* was published. As explained in the attached affidavit of Richard E. Cree, Executive Vice President

Calling Systems, Request for Waiver by Cingular Wireless LLC, CC Docket No. 94-102, Order, FCC 01-296 (rel. Oct. 12, 2001); *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Request for Waiver by Verizon Wireless*, CC Docket No. 94-102, Order, FCC 01-299 (rel. Oct. 12, 2001); *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Request for Waiver by AT&T Wireless Services, Inc.*, CC Docket No. 94-102, Order, FCC 01-294 (rel. Oct. 12, 2001); *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Request for Waiver by Nextel Communications, Inc.*, CC Docket No. 94-102, Order, FCC 01-295 (rel. Oct. 12, 2001).

¹⁸ *Verizon Waiver Order* ¶ 1.

¹⁹ *E.g., id.* ¶¶ 14-17.

for Business Development and Intellectual Property (dated Feb. 21, 2002) (“Cree Aff.”),²⁰ grant of this temporary waiver is in keeping with the Commission’s precedent and rules.

Present compliance with Amended Rule 64.710 is technically infeasible because approximately one-third of the prison sites T-NETIX serves do not yet have equipment that can provide real-time exact per-minute quotes. T-NETIX began upgrading its network in 1999 with equipment that is capable of remote programming in order to provide service more efficiently and at less cost. Cree Aff. ¶ 3. This equipment, which is proprietary to T-NETIX and custom-built in its plant, will allow T-NETIX to comply with Amended Rule 64.710 by providing real-time per-minute quotes based on the actual time of day and distance of every inmate call. *Id.* T-NETIX equipment is already compliant with the rule in around two-thirds of its sites; it has 431 sites yet to upgrade with compliant equipment. *Id.* ¶ 4. These 431 sites cover 20,000 of the more than 51,000 access lines that T-NETIX serves.

T-NETIX has calculated its costs for completing its network upgrade. Capital costs, which cover the cost of building the new equipment, amount to \$11,034,867. Cree Aff. ¶ 5. The cost for training, installation, and purchase of ancillary equipment is \$2,585,138, bringing the cost of project completion to \$13,620,005. *Id.* This amount is more than ten percent of T-NETIX’s annual revenue of \$110,000,000 and more than four times its annual net income of \$4,000,000. T-NETIX’s initial plan for this upgrade called for completion of the remaining 431 sites over three years, or until 2005. Cree Aff. ¶ 6. In order better to comply with the Commission’s rules, however, T-NETIX will endeavor to finish all upgrades within 18 months. *Id.* This accelerated schedule will double T-NETIX’s planned capital expenses over the accelerated

²⁰ Richard Cree has been Executive Vice President of Business Development and Intellectual Property of T-NETIX since July 2000. He has been an officer of T-NETIX since 1999. Cree Aff. ¶ 1.

build-out period. Nonetheless, T-NETIX is committed to deploying its advanced equipment as soon as possible, to reach full compliance with Amended Rule 64.710.

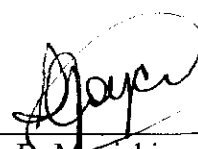
Grant of the limited relief that T-NETIX seeks will serve the public interest. As T-NETIX has shown, it is well underway in upgrading its network in a manner that will enable it to comply with Amended Rule 64.710. It has a definitive, targeted and expeditious plan to complete the upgrade, despite the significant capital costs that it will incur. This plan ensures full compliance with the Commission's rate disclosure rules by June 2003.

Moreover, were the Commission to deny T-NETIX a waiver, it would imperil the inmate services that T-NETIX provides. Because T-NETIX is the sole service provider in each of its facilities, in accordance with the rules set forth by these facilities, telephone service to the inmates at the 431 affected sites could be seriously disrupted if it is forced into non-compliance with FCC rules. In order to continue effective telephone service to these inmates and their families, T-NETIX seeks to remain operational at these sites while it completes the network upgrades begun in 1999.

CONCLUSION

For these reasons, T-NETIX respectfully requests that the Commission (1) clarify Amended Rule 64.710 by revising the definition of "total cost of the call," and (2) grant T-NETIX a limited waiver of Amended Rule 64.710, in light of the technical infeasibility of compliance in some of its facilities, in order to allow completion of the necessary remaining network upgrades.

Respectfully submitted,

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Dated: February 22, 2002.

Counsel for T-NETIX, Inc.

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Billed Party Preference for)	
InterLATA 0+ Calls)	
)	

**AFFIDAVIT OF RICHARD E. CREE IN SUPPORT OF
T-NETIX PETITION FOR CLARIFICATION AND WAIVER**

I, Richard E. Cree, hereby attest to the following:

1. I am Executive Vice President of Business Development and Intellectual Property of T-NETIX, Inc., a Dallas-based provider of inmate operator and telecommunications services.

2. I have held this position since July 2000. I have been an officer of T-NETIX since June 1999, when it acquired Gateway Technologies, Inc., an inmate operator services provider where I served as President for ten years.

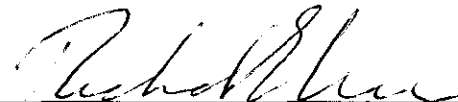
3. In June 1999, T-NETIX began a major network upgrade project to replace its inmate operator services platforms throughout the country with new equipment that is capable of remote programming. This equipment enables T-NETIX to provide operator services to inmates in correctional facilities. Among its functionalities is the provision of rate quotes as are required by the Commission's rules. The new equipment will perform precise rate quotes stating the exact per-minute charge applied to a call, including all surcharges, based on the time, day and distance of the call.

4. Since 1999, T-NETIX has replaced its platform equipment in approximately two-thirds of the more than 1400 correctional facilities that it serves. Presently there are 431 facilities that require equipment replacement. Expressed in the number of lines served, T-NETIX has upgraded approximately 30,000 of the more than 50,000 access lines that it serves.

5. T-NETIX has calculated the total cost of completion to be \$13,620,005. Of this amount, \$11,034,867 represents the cost of producing the new platform equipment, and \$2,585,138 is the cost of training, installation labor, and purchase of ancillary equipment. Its per-line cost of replacement is \$650, with an average facility having 50 access lines. Thus, the network upgrade will cost an average of \$32,500 per facility.


6. T-NETIX had initially planned to complete this network upgrade by 2005. In order to comply with the Commission's recent order prohibiting approximate or maximum per-minute rate disclosures, T-NETIX will double its replacement efforts and use best efforts to complete the project within 18 months.

I hereby attest and affirm that the foregoing statement is true and correct to the best of my knowledge.


Richard E. Cree

NOTARY: The foregoing was sworn to before me on this 21st day of February, 2002.

My commission expires 10/29/2004.

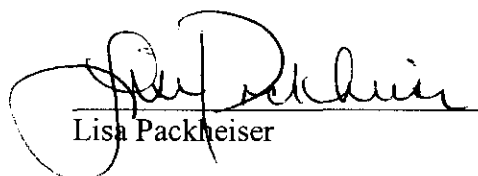

(Notary sign above)

SHARON A. BECK
(Notary print name above)



CERTIFICATE OF SERVICE

I, Lisa Packheiser, hereby certify that on this 22nd day of February, 2002, copies of the foregoing T-NETIX Petition for Clarification and Waiver were served upon the following persons via courier:



Lisa Packheiser

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